

KANG HAGGERTY

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October 20, 2021

Via ECF

Honorable Denise L. Cote
U.S. District Court for the Southern District of New York
500 Pearl Street, Room 1910
New York, NY 10007

Re: *Thomas Koestler v. Martin Shkreli*, No. 16-cv-7175-DLC

Dear Judge Cote:

On behalf of Non-Party Kang Haggerty, I write to respectfully request permission to file under seal certain portions of Exhibit A to Kang Haggerty's letter to the Court dated and filed today. The requested redacted information contains confidential and sensitive financial and banking information, as well as the amounts of attorney's fees paid to Kang Haggerty, which are confidential. Each of the requested redactions contains confidential business information relating to Kang Haggerty and other individuals and entities, including the United States government and other law firms, that has not been released into the public domain. The sealing of this information is necessary to preserve the higher values of protecting confidential business and banking information of Kang Haggerty and other individuals and entities, and thus, sealing limited portions of Exhibit A is narrowly tailored to achieve the aim of preserving such higher values.

In accordance with Rule 7.B of Your Honor's Individual Practices in Civil Cases and with the requirements for electronically filing under seal, Kang Haggerty will publicly file its letter with the redacted Exhibit A, and on a separate docket entry, Kang Haggerty will file under seal the letter with an unredacted copy of Exhibit A.

Respectfully submitted,

/s/ Kandis L. Kovalsky

Kandis L. Kovalsky

Counsel for Non-Party Kang Haggerty & Fetbroyt LLC

cc All counsel of record (via ECF)

Granted.
Denise Cote
10/20/21

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